

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**TERRY HARRIS, DOROTHY WATFORD,
WEALTH BUILDERS INTERNATIONAL,
A LIMITED LIABILITY COMPANY d/b/a
WEALTH BUILDERS INTERNATIONAL
INVESTMENT CLUB, and WEALTH
BUILDERS INTERNATIONAL
INVESTMENT CLUB,**

PLAINTIFFS,

V.

) Civil Action No.: 2:05cv1083 WKW

JOSEPH BORG, individually and in his)
capacity, as Commissioner of the Alabama)
Securities Commission,)

DEFENDANT.

MOTION TO AMEND COMPLAINT

Come now the Plaintiffs and request leave to amend the Amended Complaint on the following grounds:

1. That Wealth Builders International, L.L.C. d/b/a Wealth Builders International Investment Club and Wealth Builders International Club are indispensable parties of the outcome of the lawsuit.

2. That Wealth Builders International, L.L.C. and Wealth Builders International Investment Club are the real parties in interest.

3. Further, the Amended Complaint is necessary to delete allegations of class action.

Respectfully submitted,

/s/ Henry L. Penick
Henry L. Penick
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319 17th Street North, Suite 200
Birmingham, Alabama 35203
(205) 252-2538

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above Amended Complaint on this the 11th day of December, 2006, by placing a copy of same in the U.S. Mail, postage prepaid and properly addressed as follows:

Bruce J. Downey, III
Capell & Howard, P.C.
P.O. Box 2069
Montgomery, AL 36102-2069

/s/ Henry L. Penick